

**UNITED STATES DISTRICT COURT**  
**EASTERN DISTRICT OF TENNESSEE**  
**AT KNOXVILLE**

<b>M.B., et al.,</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	
<b>v.</b>	)	<b>No. 3:21-CV-317</b>
	)	
<b>GOVERNOR BILL LEE, et al.</b>	)	
	)	
<b>Defendant.</b>	)	

**LIST OF PROPOSED MEDICAL EXEMPTIONS TO A UNIVERSAL MASK**  
**MANADATE**

Comes Now Defendant Knox County Board of Education (“KCBOE”), by and through counsel, and submits this List of Proposed Medical Exemptions to a mask mandate as required by Paragraph 6 of the Court’s Order [Doc. 35] (hereinafter “the Order”).

KCBOE continues to assert that a list of medical conditions to be exempted is not a workable system. A determination of if a student must be exempted from wearing a mask should be made on an individualized basis. *PGA Tour, Inc. v. Martin*, 532 U.S. 661, 688, 121 S. Ct. 1879, 1896 (2001). However, the below list was compiled in consultation from KCBOE staff and parent submissions. KCBOE would note that not every student with some of the below conditions is incapable of wearing a mask (either due to medical, behavioral or instructional reasons) but some students certainly **are** and thus KCBOE had to list the entire category of medical conditions in order to comply with the Order.

<ul style="list-style-type: none"><li>• ADHD</li></ul>	<ul style="list-style-type: none"><li>• Allergies to pollen, mold, or dust</li></ul>
<ul style="list-style-type: none"><li>• Angelman's syndrome</li></ul>	<ul style="list-style-type: none"><li>• Anxiety</li></ul>
<ul style="list-style-type: none"><li>• Any Medical Exemption from a Medical Provider</li></ul>	<ul style="list-style-type: none"><li>• Asthma</li></ul>
<ul style="list-style-type: none"><li>• Asthma with Hypoxia</li></ul>	<ul style="list-style-type: none"><li>• Auditory Processing Disorder</li></ul>

• Autism	• Bi-Polar Disorder
• Brain Tumors	• Cardiac Syncope
• Central Venous Catheter	• Cerebral Palsy
• Chiari malformation	• Chronic Lung Disease
• Congenital Heart Failure	• Congenital hypothyroidism
• Congestive Heart Failure	• Convergence Insufficiency
• Deaf and Hearing-Impaired Students and Staff	• Developmental Delay
<ol style="list-style-type: none"> <li>1. Staff working directly with Deaf students be allowed to use a face shield in place of a mask.</li> <li>2. Deaf Interpreters.</li> <li>3. Face Shields in place of a mask for Deaf and Hearing Impaired.</li> </ol>	• Down syndrome
• Depression	• Exercise Induced Laryngeal Obstruction
• Diabetes	• Epilepsy
• Dyslexia	• Facial Dermatological conditions
• Eosinophilic Esophagitis	• GERD
• Facial deformities	• Hydrocephalus
• Fetal Alcohol Syndrome	• Long COVID-19
• Hunter Syndrome Eczema	• Multiple Combined Disabilities
• Intellectual disabilities	• Neonatal Abstinence Syndrome
• Medical Exemption from Psychiatrist	• Panic Attack
• Muscae Volitantes	• Partial Airway Obstruction
• Neurocardiogenic Syncope	• Physical Disabilities including paralysis
• PANS/PANDA	• Post-Traumatic Stress Disorder
• Partial Trisomy 9q	• Psychotic Disorder NOS
• Post-Thrombotic syndrome	• Pulmonary Embolism
• Pre-K Students	• Sensory Processing Disorders
• Pulmonary diseases (e.g., epiglottitis, COPD etc.)	• Syringomyelia
• Schizophrenia	• Speech Impediment
• Speech Delay and Other Challenges	
• Spinal syrinx	
• Unresponsive individuals	

Respectfully submitted,

s/David M. Sanders  
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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was filed electronically on the date recorded by the Court's electronic filing system. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular United States Mail, postage prepaid. Parties may access this filing through the Court's electronic filing system.

s/David M. Sanders  
David M. Sanders